IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND NORTHERN DIVISION

ANDREEA IACOBETI

Plaintiff,

٧.

GENNA LEIGH ROSE WEEKS

Defendant.

Case Number: 1:23-CV-1758

Judge: Beth P. Gesner

JOINT STATUS REPORT

COMES NOW the parties, by and through their respective counsel, and submit the following Joint Status Report pursuant to this Honorable Court's July 28, 2023, letter to counsel:

1. <u>Settlement Conference:</u>

The parties agree that a settlement conference in this case would be most beneficial in November or December of 2023, by which time the parties and any key fact witnesses will have been deposed and Plaintiff will have submitted to a defense medical examination, if requested.

2. <u>Discovery of Electronically Stored Information:</u>

Plaintiff will be requesting any usage history from the cellular device of Defendant on the date of the accident and any information downloaded from the onboard data recorder on Defendant's vehicle. Likewise, Defendant will be requesting any usage history from the cellular device of Plaintiff on the date of the accident. The parties do not anticipate any other discovery as it relates to electronically stored information.

3. Changes to Proposed Scheduling Order:

The parties do not request any changes to the proposed Scheduling Order.

4. Expert Discovery:

The parties are not requesting to defer expert discovery until after summary judgment motions are resolved.

5. Deposition Hours:

The parties are confident that 15 hours of depositions of fact witnesses per party is sufficient in this case.

Respectfully submitted,

BUDOW AND NOBLE, P.C.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 4th day of August, 2023, the foregoing Joint Status Report was e-filed and e-served to the following:

William C. Hudson, Esquire Law Office of William C. Hudson 9748 Stephen Decatur Highway, Suite 111 Ocean City, Maryland 21842 Attorney for Plaintiff, Andreea lacobeti

/s/

Anne K. Howard, Esquire, Bar No.: 04729 David H. Fleishman, Esquire, Bar No.: 30607